

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SUZANA KRAJISNIK)	
)	Case No. 1:21-cv-00775
Plaintiff,)	
)	Honorable John Z. Lee
v.)	
C.D. PEACOCK, INC., SEYMOUR)	
HOLTZMAN, individually, ROBERT)	
BAUMGARDNER, individually, DYOL)	
HILL, individually, CHRISTOPHER)	
CROTEAU, individually, & YINGXUE)	
DUAN, individually,)	
Defendants.)	
)	

**DEFENDANT C.D. PEACOCK'S UNOPPOSED MOTION TO SEAL
EXHIBITS K AND R TO PLAINTIFF'S AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 5.2(d) and Local Rule 26.2(b), Defendant C.D. Peacock, Inc. (“Defendant” or “CDP”) hereby moves the Court for an order sealing Exhibits K and R filed in support of Plaintiff Suzana Krajisnik’s (“Plaintiff”) Amended Complaint. In support of this Motion, CDP hereby states:

1. On February 11, 2021, Plaintiff filed a Complaint and 18 Exhibits. (Dkt. No. 1).
2. On February 11, 2021, CDP filed a Motion to Seal Plaintiff’s Complaint and Exhibits (“Motion”) on the basis that they included protectable confidential and/or trade secret information of Plaintiff and/or third parties. (*See* Dkt. No. 6).
3. On February 12, 2021, the Court granted in part and denied in part CDP’s Motion, ordering that certain paragraphs of the Complaint and certain exhibits be sealed or redacted to protect CDP’s information and/or the information of third parties. (*See* Dkt. No. 8).

4. On February 15, 2021, Plaintiff filed an Amended Complaint and Exhibits sealed and/or redacted pursuant to the Court's order. (Dkt. No. 9).

5. Plaintiff's recently filed Exhibits K and R inadvertently still reveal the personal addresses of certain of CDP's customers. (*See* Dkt No. 9).

6. Plaintiff's counsel and CDP's counsel have conferred and Plaintiff has agreed to redact the personal addresses of CDP's customers contained in Exhibits K and R and file amended exhibits accordingly.

7. Plaintiff's counsel has further affirmed that Plaintiff does not oppose this Motion.

WHEREFORE, CDP hereby respectfully requests that the Court issue an order sealing Exhibits K and R (Dkt. No. 9, Attachment Nos. 7 and 13) and permitting Plaintiff to file amended Exhibits K and R with the personal addresses contained therein redacted.

Dated: February 19, 2021

Respectfully submitted,

C.D. PEACOCK, INC.

By: s/ Jane M. McFetridge
One of Its Attorneys

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CERTIFICATE OF SERVICE

I, Jane M. McFetridge, an attorney, certify that on February 19, 2021, I caused a true and correct copy of the attached *Defendant C.D. Peacock, Inc.'s Unopposed Motion to Seal Exhibits K and R* to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys and parties of record registered with the Court's ECF/CM system:

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s/ Jane M. McFetridge